

STEPHEN J. ERIGERO (NV Bar No. 11562)  
**ROPERS MAJESKI PC**  
3753 Howard Hughes Parkway, Suite 200  
Las Vegas, Nevada 89169  
Phone: (702) 954-8300  
Facsimile: (213) 312-2001  
Email: [stephen.erigero@ropers.com](mailto:stephen.erigero@ropers.com)

Attorneys for Plaintiff ADVENTUREMOBILE INC.

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA – CLARK COUNTY**

ADVENTUREMOBILE INC.,

Plaintiff,

v.

RLD DESIGN LTD, a South African  
Company; and DOES 1-25, Inclusive,

Defendants.

**CASE NO. 2:22-cv-01315-RFB-BNW**

***Hon. Magistrate Judge Brenda Weskler***

**PLAINTIFF ADVENTUREMOBILE  
INC.'S STATUS REPORT REGARDING  
PROOF OF SERVICE OF PROCESS ON  
DEFENDANT RLD DESIGN LTD.**

**NO HEARING REQUESTED**

**Complaint Filed: August 17, 2022**

Plaintiff Adventuremobile Inc. respectfully submits this Status Report as ordered by the  
Hon. Magistrate Judge Brenda Weskler on November 4, 2022. ECF No. 7, p. 5.

## I.

**INTRODUCTION**

On November 4, 2022, the Hon. Magistrate Judge Brenda Weskler ordered as follows:

“IT IS ORDERED that ECF No. 6 [Motion to Extend Deadline to File Proof of Service] is GRANTED to the extent that Plaintiff shall have 120 days from the date this Court issues the Letters Rogatory to file a proof of service or a status report explaining why a proof of service has not been filed and how much additional time is necessary to file the same.” ECF No. 7, p. 5.

The Letters Rogatory were issued on November 15, 2022. ECF No. 11.

Accordingly, Plaintiff’s current deadline to serve proof of service is March 15, 2023.

As set forth in motion to extend deadline to file proof of service, Defendant RLD Design, Ltd. is a South African Company. The Republic of South Africa is not a signatory to the Hague Convention for service of summons and complaint and therefore the only way to serve RLD is to proceed through Letters Rogatory, *i.e.*, through diplomatic channels involving the United States State Department and its counterpart in the Republic of South Africa.

## II.

**STATUS OF SERVICE AND ADDITIONAL TIME NECESSARY TO EFFECTUATE SERVICE**

The process server retained in this matter is Francesco Pecoraro of Adesso Process Service. Mr. Pecoraro initially advised that it will take 3-6 months from the date of the issuance of the Letters Rogatory to complete service of process on a Republic of South Africa corporation. However, he recently advised that his initial estimate was rather too ambitious and optimistic. Mr. Pecoraro now advises that it will take between 12-15 months to effectuate service of summons and complaint on a defendant in South Africa.

When asked about the status of service, Mr. Pecoraro advised that the entire process of service through Letters Rogatory is opaque as the United States State Department does not provide a status of progress on Letters Rogatory. Therefore, it is unclear whether or when the State Department issues a request for service to its counterpart in the Republic of South Africa.

Only this Court has the power to issue an order to the State Department to provide a status of service through Letters Rogatory.

Plaintiff has been diligent in its efforts in its attempts on effectuating service of process on RLD. See ECF No. 6-2, ¶¶ 4-10.

Plaintiff has been in frequent contact with Mr. Pecoraro. Based on Mr. Pecoraro's advice gained from his experience of service of process in the Republic of South Africa, Plaintiff anticipates it will take an additional 5-6 months from the date of the current deadline of March 15, 2023 to complete service on RLD and then file the proof of service with the Court.

### III.

#### CONCLUSION

Accordingly, Adventuremobile respectfully requests that the Court extend the deadline for filing of the Proof of Service for 150-180 days from the current deadline of March 15, 2023 (*i.e.*, through August 15, 2023 or September 15, 2023).

Dated: March 2, 2023

ROPERS MAJESKI PC

By: 

STEPHEN J. ERIGERO  
(NV BAR NO. 11562)  
ROPERS MAJESKI PC  
3753 Howard Hughes Parkway, Suite 200  
LAS VEGAS, NEVADA 89169  
Phone: (702) 954-8300  
Facsimile: (213) 312-2001  
Email: stephen.erigero@ropers.com

Attorneys for Plaintiff  
ADVENTUREMOBILE INC.

#### ORDER

IT IS ORDERED that ECF No. 12 is GRANTED.

IT IS FURTHER ORDERED that Plaintiff has until September 15, 2023 to file proof of service.

IT IS SO ORDERED  
DATED: 3:44 pm, March 03, 2023

  
BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE